

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA,
ATLANTA DIVISION**

TAYLOR GIPSON,)	
)	
Plaintiff,)	
)	CIVIL ACTION NO.
v.)	
)	1:12-cv-03210-JOF
POPEYE’S CHICKEN &)	
BISCUITS, A/K/A NASHVILLE)	JURY TRIAL DEMANDED
RESTAURANT MANAGEMENT,)	
LLC, and COBB COUNTY,)	
GEORGIA)	
)	
Defendants.		

**JOINT MOTION TO EXTEND DEADLINE TO FILE JOINT
PRELIMINARY REPORT AND DISCOVERY PLAN**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Counsel for Plaintiff Taylor Gipson and Defendant Popeye’s Chicken & Biscuits a/k/a Nashville Restaurant Management, LLC (“Nashville”) jointly request that the Court extend the deadline for filing the Joint Preliminary Report and Discovery Plan until November 24, 2012. In support of their motion, the parties show the Court as follows:

1.

Pursuant to Local Rule 16.2, a Joint Preliminary Report and Discovery Plan must be filed within thirty days after the appearance of the first defendant by answer or motion or within thirty days after a removed case is filed in this Court.

2.

Defendant Nashville filed its Answer on October 12, 2012, making the current deadline for filing the Joint Preliminary Report and Discovery Plan November 11, 2012.

3.

Defendant Cobb County, Georgia's ("Cobb") answer is not due until November 17, 2012, six days after the deadline for filing the Joint Preliminary Report and Discovery Plan.

4.

The parties believe that it more efficient to extend the deadline for filing the Joint Preliminary Report and Discovery Plan until November 24, 2012, one week after Cobb's answer is due, in order to allow Cobb to participate in the completion of the Joint Preliminary Report and Discovery Plan with Plaintiff and Defendant Nashville and create the same discovery period and plan for all parties.

WHEREFORE, Counsel for Plaintiff and Defendant Nashville respectfully request that request that the Court extend the deadline for filing the Joint Preliminary Report and Discovery Plan until November 24, 2012. A proposed Order is attached for the Court's consideration.

Respectfully submitted on October 25, 2012.

s/ A. Lee Parks
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s/ William E. Grob
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Georgia Bar No. 312902
Attorney for Defendants

CERTIFICATE OF SERVICE

I certify that, on October 25, 2012, I filed the foregoing document through the Court's CM/ECF system, which will send email notification of such filing to all attorneys of record in this matter.

s/ A. Lee Parks

A. Lee Parks

Parks, Chesin & Walbert, P.C.

75 Fourteenth Street, 26th Floor

Atlanta, Georgia 30309

Georgia Bar No. 563750

Attorney for Plaintiff

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LLC, and COBB COUNTY,)	
GEORGIA)	
)	
Defendants.		

ORDER

Counsel for Plaintiff Taylor Gipson and Defendant Popeye’s Chicken & Biscuits a/k/a Nashville Restaurant Management, LLC filed the Joint Motion to Extend the Deadline to File the Joint Preliminary Report and Discovery Plan until November 24, 2012. For good cause shown, the parties’ Joint Motion is hereby GRANTED. The deadline to file the Joint Preliminary Report and Discovery Plan is hereby extended to November 24, 2012.

IT IS SO ORDERED, this ____ day of _____, 2012.

(Signature on Next Page)

HON. J. OWEN FORRESTER
UNITED STATES DISTRICT COURT